

RADIOLOGIC TECHNOLOGY CERTIFICATION COMMITTEE MEETING

March 14, 2007

NEW OTANI HOTEL AND GARDEN

120 SOUTH LOS ANGELES

LOS ANGELES, CA

MEMBERS PRESENT

**FRIEDA TAYLOR, CHAIRPERSON
NEIL MANSDORF, DPM
BERNIE GOLER, MD
MARGARET HISH-SHUNG LEE, M.D.
JOYCE COHEN, CRT, ARRT
DIANE GARCIA, CRT (R), ARRT (R), CT**

**ROGER ENG, MD
JANIS OWENS, MD
CHAD WARDSEHL, DC
MELISSA MARTIN, MS
ADAM SOMMERSTEIN, MD**

MEMBERS ABSENT

EDWARD BENTLEY, M.D.

MEETING SUMMARY

Ms. Frieda Taylor, Chairperson of the RTCC, called the meeting to order at 9:02 AM. Ms. Taylor gave an opening statement, which included welcoming committee members, new members, and introduced the court reporter. She introduced staff of the Radiologic Health Branch that were present in the audience. Ms. Taylor outlined several housekeeping items. The court reporter has requested that, prior to speaking, the audience clearly state their name and affiliation and speak loudly, clearly, and a bit slowly into the microphone. Ms. Taylor also gave the time limits for all comments and asked that all cell phones be turned off or set to vibrate. Ms. Taylor explained that due to Mr. Philip Scott's absence due to a family emergency that Linda Ortega would give her subcommittee report in his time slot. Lunch would be from 11:30 – 1:00 and the first item on the agenda in the afternoon would be the dental subcommittee report, bone densitometry would be at 1:30 pm. There would be a break at 2:00 pm, at 2:15 pm, the fluoroscopy report would be given, and the public comment would be from 3:45 to 4:30 pm, with adjournment at 4:45 pm.

First Item on the Agenda: Approval of the minutes of the September 21, 2006 meeting.

Motion to approve the minutes by Dr. Adam Sommerstein, seconded by Melissa Martin. Diane Garcia had some minor changes on pages 4, 5 and 6. Dr. Janis Owens had a minor change on page 6. Motion Passed.

Second item of the Agenda: Yolanda Powell, Registration Certification Support Unit. Ms. Powell presented a report on the application process for the certification section, including the supervisor operator applications, the radiologic technologists' applications, and the limited permittee applications. She asked that all changes be submitted in writing and on the correct application. Ms. Powell reported that ARRT does not accept multiple applications. If they receive a second application, they will place the second application on hold for 90 days. RHB cannot issue a certificate for fluoroscopy without documentation from ARRT. Please contact Ms. Powell if you haven't received any correspondence from RHB within 60 days. Ms. Powell asked if there were any questions or comments from the audience. Mr. Alberto Hermogeno, Director of Diagnostic Imaging, Kaiser Permanente, Southern California, gave comment regarding the new graduate hires and the delay in the issuance of fluoroscopy certificates. Ms. Powell responded that one problem with fluoroscopy applications being issued is that the applicants are not CRT-certified. Applicants without CRT certification are not eligible to receive a fluoroscopy permit from RHB. Additionally, there is an examination process that the applications must go through. Ms. Taylor added that this is a regulatory process. Students are applying for work and making promises on when they will have their certifications. If an employer hires a student before they have the proper credentials, it is a risk that the employer is taking. Further comments or questions can be submitted in an email to Ms. Powell or Ms. Taylor.

Ms. Taylor had another housekeeping item. She commented that there were three outgoing RTCC members and introduced the new RTCC members: Adam Sommerstein, Neil Mansdorf, and Diane Garcia. She also mentioned that Ms. Melissa Martin has been reappointed to the RTCC.

Third item of the Agenda: Sudana Kwok, Chief of the Certification Unit introduced her staff and gave a brief description of their assignments. She also introduced Ms. Karen Hobson, Certification Support Unit manager, who is responsible for process of issuing certificates. She briefly went over open items from the September meeting. She commented that all schools were asked to update their graduation diplomas and that they (RHB) have received 96 out of 97 of the updates. All schools should now be using their new school IDs. The Unit is working on a standard form to be used by all schools for the purpose of clinical site approvals. Ms. Kwok went over the two items listed under notification requirements – approve school student report and report of change information for approved schools. Ms. Kwok went over the forms and requirements.

Ms. Kwok turned over the podium for a presentation by Ms. Wendy Tellez. Ms. Tellez presented an overview of the Certification Unit's expectations and some of the observations made while performing school audits and clinical site visits. After her presentation Ms. Tellez opened up for public comment and questions. Ms. Anita Slechta, CSRT, had a question on RHB using email to mail the RHB certification unit newsletter which is emailed to all of the approved schools to provide updates and clarification on various school related topics. Ms. Slechta was uncomfortable with not receiving hard copies. Ms. Kwok explained that the emails were an informal process

and anything specific would be mailed in a letter and not sent via email. Ms. Slechta's next question dealt with what was the legal authority for the rules. For example, the rules about student daily logs and x-ray films. Ms. Kwok explained that the regulatory authority was from title 17. Ms. Taylor further clarified the responsibility and asked that Ms. Slechta send an email to Ms. Kwok with the specific questions and follow-up. Ms. Taylor informed the audience that questions submitted via email and that cannot be answered in this forum would be responded to as appropriate and that the responses would be placed on the branch's website, along with the minutes of the meeting. Mr. William Chi, the legal counsel, further clarified that the legal authority for RHB was from the Health and Safety Code and the California Code of Regulations.

The next question came from Mr. Albert Hermogeno, Kaiser Permanente, Southern California. He asked how long do students need direct supervision until deemed competent. Ms. Taylor responded that his questions were clinical site questions and that this was the wrong forum for this question unless there were some additional questions within the regulations that the committee wanted to address. She then gave permission to the next speaker.

Nancy Perkins, Bakersfield College, program director of radiography, also asked that RHB follow up email requests with hardcopy. Ms. Kwok responded that the branch was sending information out both ways, email and hardcopy. She asked to be kept informed if only one copy (email or hardcopy) was being received. Chairperson Taylor reiterated what Ms. Kwok said. She stated that the reason the emails started was at the request of program and school directors because hardcopy was slow and communication wasn't being received in a timely manner. For many cease and desists that have been initiated, RHB has emailed, mailed by certified letter, and has sent a fax. Mr. Chi stated that in order to preserve rights and due process hardcopies would continue to be sent as this satisfies the Code of Civil Procedures and the Administrative Procedures Act.

Next member of the audience was Dawn Charmin, Program Director, El Camino College. She added her position to email and hardcopy asking that the mail be addressed to radiography program so the mail doesn't get lost internally. Ms. Kwok and Ms. Taylor noted that changes in how mail is sent must be submitted in writing to RHB. Ms. Charmin said she had done so. Ms. Charmin's next question dealt with how long the schools must keep the original student logs at the clinical site. Ms. Kwok and Ms. Taylor suggested that she send the question detailed via email to Ms. Kwok. Ms. Charmin then asked if they could be notified of site visits in advance in case there were other things going on. Ms. Kwok said she would get back to her on that question.

Next speaker was Debra McMahan, program director, department chair, Santa Barbara City College. She commented on the changing requirements brought on by changing administration and direction by RHB. That the requirements seem more onerous and with little prior notification. Ms. Taylor stated that all changes have been made to clear up past practices and that the new requirements have been cleared with the legal office to make sure that RHB is in 100 percent compliance with the Health and Safety Code.

Everything that is being done is to protect the citizens of the State of California. Ms. Taylor then asked that questions be held until the public comment period.

Following a break, Ms. Taylor introduced staff who will be working with the RTCC in the future and working with Mr. Don Bunn, the RTCC coordinator and who will be replacing him in the future. Ms. Mary Frances Orduno will assume his RTCC coordinator duties. Ms. Maureen Roush will be her backup. They are both analysts in Karen Hobson's unit. Ms. Hobson is the staff services manager. Ms. Taylor then turned to the next item on the agenda.

Fourth Item on the Agenda: Ms. Sudana Kwok made a presentation on a position statement regarding the Joint Review Committee on Education in Radiologic Technology (JRCERT). Copies of the presentation were made available to the audience after lunch. Ms. Taylor and Ms. Kwok visited JRCERT headquarters and attended their workshops in order to acquire an overview of JRCERT and their role under the accreditation process and to establish a clear delineation on any overlap between JRCERT and the RHB process for approval of RT schools. Based on the visit and interviews with JRCERT's executive staff, Ms. Taylor and Ms. Kwok concluded that the philosophy and all concepts between the two agencies were not compatible. RHB will not be moving forward into entering into a formal cooperative agreement with JRCERT that would grandfather the JRCERT accreditation and inspection process. However, RHB will continue to evaluate the feasibility for future consideration.

Committee Member Garcia commented that instead of getting rid of JRCERT entirely that possibly RHB could just add in the areas that RHB was concerned about and continue to use JRCERT as the gold standard. Ms. Taylor responded that RHB didn't say it would not be considered later. But she asked that the committee read the entire position paper, provide additional comments, perhaps as an additional item at the next RTCC committee meeting with specific questions regarding specific areas that the program directors may feel would be appropriate to grandfather in. There were additional comments from committee members on continuing to evaluate JRCERT and Ms. Taylor again requested that the committee members read the entire position paper and then provide any questions in writing to her and Ms. Kwok.

Fifth Item on the Agenda: Minimum Standard for Limited Permit Schools. Ms. Linda Ortega, the subcommittee chairperson, did an overhead presentation. Ms. Ortega introduced the subcommittee members. The subcommittee first met on November 30th and has met five times subsequent to that. Ms. Ortega presented her paper and went over all the recommendations and changes. She then asked if there were any questions from the committee. Dr. Mansdorf had some comments on the issue of length of podiatric radiography and the issue of striking "the knee" from the qualifications for podiatric XT certificate. Dr. Mansdorf stated his reasons for not striking "the knee" and stated that the California Orthopedic Association, the Board of Podiatric Medicine, and the California Podiatric Medical Association have also recommended keeping "the knee". Dr. Mansdorf also commented on "direct supervision" and "indirect supervision". Ms. Ortega stated that the subcommittee is going to look at putting "the

knee” back in and also that Dr. Mansdorf would be working with the subcommittee on some of their other recommendations.

Comments from the audience: Anita Slechta, CSRT, program director, CSU, Northridge, asked whether when the subcommittee has completed the document whether it will go to the full committee for acceptance? Ms. Ortega replied that they will be presenting it to the RTCC for their review, full acceptance, or they may be charged to make more changes. Ms. Slechta then asked whether RHB was required to accept the RTCC recommendations or whether there was discretion. Ms. Taylor turned the response to Mr. Chi, the legal counsel, who replied that the department’s acceptance of RTCC recommendations is discretionary and not mandatory.

Next comment was from Christina Gutierrez, chiropractor. She commented that she agreed with Dr. Mansdorf’s comments on supervision and wanted to add her support.

Next comment was Debra McMahan, Santa Barbara City College. She commented on direct supervision also. She also commented that supervision issue should be consistent within one area of radiography as well as others. The standards should be equal for all.

Ms. Slechta again commented that another inconsistency on the supervision issue was the JRC and any fully-approved JRC program requires two years of experience for any CRT who is supervising a CRT student. She recommends that the supervision issue needs to be tightened up and upgraded a little bit.

Ms. Taylor had a few other housekeeping items after the luncheon break. She announced that the date of the next RTCC meeting will be September 26, 2007, in Sacramento. She will be soliciting agenda items from the committee prior to the meeting. She also reminded the audience and committee members that the position paper from Ms. Kwok and her visit with JRCERT has been handed out for review and comment. She also asked that they review the minutes of the previous meeting, item 4, at the top of page 4. The discussion is in that section as to the mandate of the JRCERT meeting that Ms. Kwok and Ms. Taylor attended.

Ms. Taylor informed the committee that two more subcommittees needed to be formed – the minimum standards for Diagnostic Radiologic Technology minimum standards, and the minimum standards for Radiation Therapy Technology Programs. She will be asking for the subcommittees to be formed prior to the public comment period.

Sixth Item on the Agenda: Matt Kroona, chairperson for the subcommittee, Minimum Standard for the Dental Laboratory Radiology Programs. Mr. Kroona introduced the members of the subcommittee. The subcommittee prepared some documents and had a teleconference on January 9th. Mr. Kroona and Ms. Dawn Harrat signed conflict of interest statements stating their potential conflicts. Handouts were available on the subcommittee report for the audience. Each item on the handout “Attached LP Subcommittee Proposed Changes to title 17” was discussed at the teleconference.

After going over the proposed changes, Mr. Kroona asked for any questions or comments. Ms. Taylor asked for clarification on whether the subcommittee only looked at title 17 and not the minimum standards. She asked whether the subcommittee had any intention of looking at the minimum standards. Mr. Kroona they hadn't but after listening to Ms. Ortega's subcommittee report he felt he needed to do so. It would be a separate document though than the one he just proposed. It wouldn't be combined. Mr. Kroona's intention is to talk with Ms. Ortega and parallel track her paper.

Committee member Cohen asked that if the restriction is lifted for things like CT that they are in their curriculum to teach so that they are sure of operating the equipment. Mr. Kroona replied that was correct. Ms. Cohen then asked computers and imaging formation. Mr. Kroona replied that was added so that the equipment could be added so digital could be done.

Committee member Garcia asked that the wording needs to be changed so that it doesn't just say "CT scanners". It should state the type of CT scanner that is appropriate for dental use so that there isn't any confusion.

Committee member Eng stated that the issue of the portable handheld digital radiography and the term tomography or XT needs to be fleshed out as to the definition of what exactly these dental XTs are allowed to do, and that it is consistent with what the subcommittee or the RTCC eventually deliberates on for the overall XT educational requirements for digital radiography so that they are consistent. There are some inconsistencies between dental digital imaging and general XT digital imaging. Mr. Kroona explained that the dental digital equipment is not similar to the medical digital equipment. Mr. Eng also questioned about whether the environment change with using portable change the requirement for additional training. Mr. Kroona stated that the environment doesn't change anything; there is still the same obligation to operate safely for himself and the patient.

Committee member Goler asked whether TMJs are being done anymore except tomograms. Mr. Kroona replied that all the TMJs are done with tomography units and have been since the mid 1980s.

Committee member Garcia's question was on the mobile X-ray and the radiation dosage levels. Mr. Kroona replied that it is different from the medical because the dosage was very very low.

Committee member Owens suggested that the training be done similarly to bone density where the manufacturer provides the training. Mr. Kroona commented that then should they incorporate training into all x-ray techs or are they allowed to use portable equipment if properly trained.

Committee member Sommerstein commented that even though the dosage is very very low the fear is still about radiation safety for the general public. Some provision for radiation safety would be indicated.

Questions and comments from the public on this subcommittee report.

Nancy Perkins, Bakersfield College, commented that the minimum standards need to be evaluated hand in hand with a review of title 17 and she also agreed with the committee members' comments on radiation safety issues. Ms. Perkins commented on the supervision level and questioned as to who would be supervising someone doing portable x-rays.

Ms. Linda Ortega went on record to invite Matt Kroona to participate in the Minimum Standard subcommittee or a portion of it in order to compare standards and find what is applicable to both permit areas.

Seventh Item on the Agenda: Ms. Beverley Tracewell, chairperson, subcommittee on Minimum Standard Bone Densitometry Technician Radiology Program. Ms. Tracewell introduced the subcommittee members and thanked them for their participation. After going over the proposed changes, Ms. Tracewell asked for any questions or comments.

Committee member Cohen had a question on bone density testing on the forearms and extremities. She asked what would happen if they were doing their clinical at a place that didn't do forearms. Ms. Tracewell replied that the machines would have the capability of doing the forearms and that the standards would require that they have done ten scans to get their permit and therefore would have the capability of doing the forearms.

Chairperson Taylor asked whether the subcommittee was done or if they were going to further review title 17. Ms. Tracewell replied that she wasn't planning to reconvene unless the committee wanted her to. Ms. Tracewell only gave the committee the changes and wanted to know if the committee wanted her to go back over the entire document and put in the changes for the committee's review. Ms. Taylor asked the subcommittee what they wished to do. Committee member Garcia commented that she knew very little about bone densitometry and would feel more comfortable with having the entire document with the changes. Chairperson Taylor asked if the committee wanted to get the full document with the changes submitted and then vote on it at the next committee meeting. The committee members nodded their heads. Chairperson Taylor asked for a motion. Committee member Sommerstein motioned to vote on the committee work at the next RTCC meeting in September. Committee member Eng seconded. Chairperson Taylor called for the vote and the motion was passed unanimously.

Questions and comments from the public on the subcommittee report.

Ms. Anita Slechta commented that she felt very uncomfortable with the manufacturer representatives doing the training who were not properly licensed. Committee member Martin suggested that they leave that in the minimum standards with the wording changed to indicate that the manufacturer would be required to provide a qualified

person. Ms. Tracewell agreed with this suggested change and will include it in her document. Committee member Garcia suggested that the definitions include what they mean by qualified person, a licensed XT operator. Ms. Tracewell agreed to put that in the definitions.

Melissa Miller, San Diego, Maric College, Vista, had a question on the supervision by a physician who holds a radiology or radiographer supervisor operator permit. She wanted to know if students could only be shepherded by a physician. She brought this issue up as it deals with schools. Ms. Tracewell commented that they have tried to clarify two issues in the document. The radiation safety part, and are they a good technician and doing it properly. Ms. Miller stated that she felt it was not very clear. Committee member Martin had a question on the technologist who has their bone densitometry certificate. Are they restricted to performing that in a facility in which there is a licentiate with a supervisor and operator permit? Ms. Tracewell said that was an RHB question. Ms. Taylor said that she didn't have the regulations in front of her and Mr. Scott is not at this meeting. She said it would be addressed in the minutes so that RHB has a chance to review the regulations and provide the correct answer. Committee member Mansdorf had a question that based on the minimum standards it seems to be including the technologists and the technicians as supervisors of students. Couldn't an XT or CRT also clinically supervise students. Ms. Tracewell replied that yes as they have the experience. Bob McDermott, Kaiser, Southern California, pointed out that a physician is listed as a potential instructor but the standards also state that they have one year of experience in doing procedures. He stated that this conflicts and they wouldn't be able to find a physician who has done bone densitometry. Chairperson Taylor asked about No. 8 E where they added forearms and also added "others". She asked Ms. Tracewell if they would consider adding in examples or consider specifying. Ms. Tracewell gave some examples and asked whether the Chairperson would be comfortable with that. Chairperson Taylor commented that she should state whatever she feels is important to be considered, otherwise its left open to no consideration at all. Committee Member Garcia asked that the changes be included in bold in the entire document.

Eighth Item on the Agenda: Melissa Martin, chairperson, subcommittee on Minimum Standard for Fluoroscopy Schools. Ms. Martin introduced the subcommittee members and thanked them for their participation. Ms. Martin announced that the subcommittee is meeting at Northridge on April 12th. After giving a slide presentation, Ms. Martin asked for any questions or comments. Committee member Sommerstein asked if they are discussing strictly technologists utilizing fluoroscopy or everyone, including physicians, radiologists, etc. Ms. Martin responded that they are discussing all licentiates and technologists. Committee member Sommerstein then asked is there a discussion under what circumstances technologists can utilize fluoroscopy without immediate supervision. Ms. Martin replied that they haven't approached that topic yet but it will be part of the discussion.

Bob McDermott, Kaiser, stated that to address what Dr. Sommerstein asked that RHB did produce, several years ago, a document that defines what technologists can do

under various levels of supervision for fluoroscopy. Mr. McDermott commented that he hopes in that syllabus the subcommittee actually define “cine” in a way that is meaningful and acceptable to both regulatory staff and users. Mr. McDermott then commented he hoped they would find a way to separate the residency programs for radiologists and non-radiologists. Mr. McDermott asked that the subcommittee be in contact with Philip Scott and Mark Pietz because the Legislature passed a bill that will require a radiology quality assurance program to be incorporated in title 17 and that should be in the syllabus.

Committee member Garcia had a comment about adding hands-on training. How would RHB verify that people coming from outside California have had a particular training? Ms. Martin replied that is part of the reason the AAPM standard is going nationwide with the idea that the individual states will pick this up as part of the suggested state regulations so, hopefully, most of those coming from outside of California will receive this training.

Marci Mann, x-ray technician from San Diego, commented on radiation protection. She felt there should be a way to tell the patient how much radiation they are being exposed to. Could there be some kind of a chart they could look up or some way of informing the public. There should be one marker that patients could go by, for example, a millirad or something like that. Ms. Martin replied that it would be very difficult and almost impossible to equate a dose, such as a mammogram, that is one small area of the body, to give an effective whole body dose. Ms. Mann stated there should be a common denominator. Chairperson Taylor said they would take that under consideration and perhaps the committee would address that at the next meeting. Committee member Sommerstein commented that there was a bill before the State Legislature that would require all facilities to provide patients with doses. This was a very contentious bill which did not pass because it brought up multiple administrative problems, such as who keeps the dose information and how to equate doses.

Anita Slechta asked whether the Department has considered how they are going to address the issue of publicizing the new revised syllabus because they are being tested on the old one. Chairperson Taylor replied that once the subcommittee has made their recommendations and the RTCC has adopted them, the next step will be for RHB to work on the revised exam. When that is completed, then the syllabus will be published for people to use when the next test is available.

After the break, Chairperson Taylor had a comment on a subcommittee chairperson (she couldn't remember which one) commented they weren't working on title 17. She wanted to make it clear that if the subcommittees aren't paying attention to title 17 they cannot work on the minimum standards because they have to be based on regulatory requirements. The documents must not conflict with regulatory requirements so it is essential that the subcommittees review title 17 as they work on the minimum standards.

Ms. Taylor then asked for a discussion with regard to the two subcommittees that were put on hold at the last RTCC meeting. Perhaps a motion to formulate subcommittees for the therapy and the radiation minimum standards. Committee member Cohen asked therapy and what? Ms. Taylor responded diagnostic. Committee member Sommerstein made a motion to that those subcommittees be formed. Committee member Martin seconded. The motion passed unanimously.

Chairperson Taylor said the mission of the subcommittees is to look at the minimum standards, with regards to the regulatory requirements, make any recommended changes, and look for a path to make them legally binding documents that are enforceable. Typically a minimum standard is used as a guide to ensure that the requirements of the regulations are followed. Four subcommittees are now formed and we are missing the two for Therapy and Diagnostic. For those two we need to designate a chairperson. Committee member Cohen volunteered to serve but not chair. Ms. Anita Slechta commented that not all of the subcommittees have chairs coming from the RTCC. There are many experts in the audience who are JRC site visitors and have been program directors for years. Ms. Taylor asked for volunteers from the audience.

Diagnostic subcommittee volunteers:

Ms. Anita Slechta, chairperson.
Committee member Sommerstein
Committee member Cohen
Committee member Garcia
Dawn Charman, program director, El Camino College
Jacqueline Finney, Los Angeles City College
Melissa Miller, San Diego, Maric College, Vista
Ann Colunga, El Camino College

Therapy subcommittee:

Ms. Martin volunteered Stephanie Eatmon for the chairperson. Dr. Eatmon is the director of the BSRTT program at Cal State. Ms. Martin will email her information to Ms. Taylor and Mr. Bunn.
Committee member Garcia

Chairperson Taylor asked for more volunteers for the therapy subcommittee. Committee member Garcia recommended that RHB solicit the programs themselves in the form of a letter requesting help in this area.

Ms. Taylor asked Ms. Orduno to work with Mr. Bunn to draft a letter to the therapy schools and additional names will be solicited via a formal letter. Ms. Taylor directed Mr. Bunn and Ms. Orduno to draft a special letter to Dr. Stephanie Eatmon volunteering her to participate as a chairperson and highly recommended by Ms. Melissa Martin.

Ms. Nancy Perkins, Bakersfield College, asked whether the subcommittees were required under the Brown Act to be public forums. Mr. Bunn responded that at the last meeting Mr. Phillip Scott addressed this issue and said that the subcommittees could not be required to work under that. Ms. Perkins asked that the minutes be placed on the web. Ms. Taylor responded that the minutes of the last RTCC meeting are on the website. Mr. Bunn said that the minutes of this meeting will be on the website within 30 to 60 days. The names of the new subcommittee will be in those minutes. Ms. Perkins asked whether an interested party who is not at today's meeting could contact RHB for the chairperson contact and then they could contact the chairperson and express their desire to serve on the subcommittee. Ms. Taylor said she would forward that information to the chairperson.

Public Comment Period: Ms. Taylor opened up the public comment period and reminded the audience that they had two minutes to speak. She asked that everyone follow the time period. At the end of two minutes, Ms. Taylor will say "you are done".

Committee Member Mansdorf asked if someone from RHB can respond to the status of SB 1670 and the implementation of the training program. Where are we in terms of RHB authorizing the classes? Chairperson Taylor asked him to send her an email that she could forward to Philip Scott. Otherwise, it will be covered through normal communication with the public as far as the regulatory process. We cannot give a time line at this point. Staff Counsel, William Chi, responded that the legal office has finished reviewing the emergency regulation package and he believes that the Office of Regulations has it now. However, it will be going to the director's office very soon and from there to agency. Mr. Chi had no idea of an estimated time line

Anita Slechta, Cal State Northridge, CSRT. Ms. Slechta commented that she had concerns about the intent and spirit of the law occurring in this public forum. The intent of our original licensure was to protect the citizens from radiation from uneducated licentiates and technologists, etc. She felt that the communication from the committee was stopped in the spirit of time. She felt that the committee was not abiding by the spirit of the law which is to have public oversight, public input and to serve the citizens as a whole and not just to move the agenda forward. She would like somehow for there to be an active pursuit to open up the subcommittee meetings, publicly, to do that on the web site so that people can attend. She'd like the Office of Legal Services to look into opening up the subcommittee meetings to the public. The second thing she would like is that questions that are sent via email, the answer should be in the minutes so that there are public answers.

Dawn Charman, El Camino College. Ms. Charman commented that at the RTCC meeting in Los Angeles last year, a decision was presented that RHB would no longer allow students to take the fluoroscopy exam prior to graduation. She wants to bring to the committee's attention the ramifications of this for their graduates. Students could lose the chance for employment or delay their employment for two to three months. This could be an economic deprivation of four to ten thousand dollars. She asked that the committee reconsider allowing the students to apply and take a fluoroscopy exam,

maybe within two to three months of graduation so that the process can be rated and ready. Then when they apply for their CRT licensure, it can be indicated, have you already applied for your fluoroscopy permit. Then those permits can be mailed simultaneously to the students so they can begin working.

Pamela Jones, clinical coordinator, Cañada College. She wanted to support the statement of Anita Slechta in having the answers to questions made public. She also supports her colleague who brought up the concern that she and others have, as instructors, with what is happening to their students in trying to become employed. And the third thing is that, for the committee of two, that attended the JRCERT meetings that the purpose was to establish a clear delineation of any overlap between JRCERT and RHB process for approval of Radiologic technology schools and clinical sites. The statements from the issue paper says because there are two issues that are inconsistent that RHB will not be moving forward with entering into a formal cooperative agreement and that would grandfather, which was not the charge. She asked the committee to make certain that on the next meeting that this item is on the agenda, so that we can look at the areas where we can streamline the process.

Bob McDermott, Radiation Safety Officer, Kaiser, Southern California. Mr. McDermott had concerns that due to recent legal interpretations certifications are no longer available for interns, residents, and fellows. He requests that either the committee or the branch provide clarification and issue the user operating procedures to determine qualifications, how staff should be listed on the list of users so that when inspectors visit, someone can identify staff as residents, interns, or something else, so they are not cited for someone who's not an S&O using equipment. His second comment was regarding the fluoroscopy certification process. The students rely on the training they receive to form a working relationship at the end of training and most facilities offer employment to these students. The inability to take a position in a timely manner creates problems with delivering health care to the public. He asks the Branch and the committee to investigate and implement a parallel process for technologists to take and pass or take, at least, the ARRT and fluoroscopy test simultaneously. There have already been informal discussions with legal counsel to determine that there is no legal impediment under the Health and Safety Code. As such, he requested that the regulations could be potentially changed. He asks RHB and the Committee to go forward, investigating such a process for the welfare of California citizens.

Rick Williams, student, El Camino. He stated that there is an ARRT application, a test for certification, a CRT application, a test for certification, and a fluoroscopy application test and certification. He stated that previously students could apply for fluoroscopy mixed in with the others. To him it seems more efficient to take the fluoroscopy as before. He feels it would be less liability for the hospitals to hire someone with all their licenses and not have to wait and promise that they will have their fluoroscopy in three months. This leaves the student with lost wages and the state is losing tax money. He asked the question to what benefits this.

Chairperson Taylor responded that his question is noted and will be answered with the minutes. Mr. Williams asked if there would be an answer to the benefits in the minutes. Chairperson Taylor replied that he was not going to get an answer to the benefit-cost analysis and asked what is his specific question? Mr. Williams asked if all these negatives, which are cost analysis negatives, are outweighed by a cost-analysis positive; he would like to know what it is. Chairperson Taylor replied that she didn't see how he could get a regulatory answer to that specific question but they'll try.

Chairperson Taylor noted to the audience that questions that are ambiguous in nature, the questions will be listed as stated. If the question cannot be answered without further clarification, it will be so noted in the answer.

Nancy Perkins, Bakersfield College. She said that in Yolanda Powell's presentation Ms. Powell stated that 90 days should be allowed for processing of applications. Her question is how long is it really taking. Chairperson Taylor responded that the regulations allow for 90 days. Ms. Perkins again asked but in common practice? Chairperson Taylor responded that the section receives 500 applications from four different program areas a month so we cannot give a specific answer at this time. Ms. Perkins reiterated that all of the responses to all the questions should go out to all schools and all school communication with a hard copy to ensure that it is received. Ms. Perkins also wanted to lend her support to the new subcommittee for the Diagnostic Minimum Standards Review, that the Minimum Standards could go with the position on the RTCC Committee, could a hybrid be developed or looked at. That they would be able to look at those areas of JRC and then saying these are the areas that are not covered. Maybe form some sort of hybrid group. She hopes that could be a goal or included in that subcommittee. Chairperson Taylor responded that that sounded like the best venue to further that discussion. She recommended that Ms. Perkins forward her recommendations to Ms. Slechta, the chairperson of that subcommittee.

Matt Kroona, x-ray technician. Mr. Kroona stated that one of the proposals in his subcommittee was to restate the November 2000 decision to change minimum x-rays from the mandible – to eliminate the mandible and increase the panoramic. He asked if they can request that this actually go into effect now, even though it's not reflected in the regulations. Can an exemption be granted and go to what the recommendation is which was made in 2000, which likely wouldn't get approved until 2010. The mandible is not taught at dental schools. The current regulations require that it be provided. Mr. Kroona asked if there is a mechanism that they can request an exemption from that. Who would it be sent to? Is there a possibility? Chairperson Taylor asked that he forward her an email with regard to that request. RHB can discuss if it's feasible, if it can be done, based upon the law and the regulation. Mr. Kroona asked "does that happen"? Chairperson Taylor responded that he needed to send her an email and she couldn't respond in this venue.

Jacqueline Finney, Los Angeles City College. Ms. Finney requested a clarification for the application process for her students. First, they take the ARRT exam, then send a copy of their ARRT certificate to RHB, with a \$75 check for the application fee. Second,

can they can also apply, at that time with an application for fluoroscopy and the test, with the \$75 application for fluoroscopy and \$100 for the AART to take the test. She wanted to know if this is the proper procedure for their students to take the fluoroscopy test. Chairperson Taylor responded that Ms. Powell had nodded yes. Ms. Taylor also reminded everyone that the requirements for each application submittal, the procedures for submitting the application are with the application on the branch's website. She asked that everyone get a copy of the application on the website and follow the directions explicitly. The website clearly tells you what you need to do to get each type of application, and the requirements that are necessary for each application.

Ms. Finney asked whether the two applications can be sent at the same time. Chairperson Taylor responded no and asked Ms. Powell to address the question. Ms. Powell replied that in that instance, the two applications can come together because the applicant is providing the CRT certificate from ARRT. Then they apply for the fluoroscopy permit. So they can – with the application. That's the only instance when RHB will accept two applications at the same time. Chairperson Taylor commented that perhaps RHB can add that to the question and answer section on its website. That would provide clarity for that one exception and that going directly to ARRT expedites the process.

Linda Ortega, Central California School of Continuing Education, Corona Campus. Ms. Ortega commented that in regards to the applications and testing results that the students at x-ray technician programs who receive their results from RHB, whether they have passed or failed, has been timely. She wanted to voice a thank you and that has improved. She did want to comment on a change that has happened. The failing student would get the score and that sometimes allows the student to understand what they did not do well in and what they can work on. She stated that now the student does not get the result of the exam score. Ms. Ortega's understanding is that RHB does receive the score from ARRT. She asks if it is possible that RHB take that and maybe have some discussion down the road, where we can have that, possibly put on that letter that does go back to the examinee? Chairperson Taylor responded that that can be discussed later and thanked Ms. Ortega for her comment.

Leanna Selleck, past president of CSRT, employee of UCSD Medical Center in San Diego. Ms. Selleck asked whether technologists will ever be able to renew online their licensure. She stated that there have instances in the last year where renewal forms and checks were lost, resent, lost again, then there were difficulties in getting assistance by phone. There was an instance when a change of address was sent that was not recorded, which delayed that person getting their renewal. Chairperson Taylor clarified that her section does not handle renewals. Her section handles the application process. She informed the audience that the manager for the section that handles renewals is Robert Cabral and his email address is rcabral@dhs.ca.gov. All renewal and/or renewal questions with regards to certificates, permits, and/or x-ray machines should be directed to Mr. Cabral.

Dawn Charman, El Camino College. She asked whether it was correct that regarding the licensure, with the CRT applications, that you have to provide a copy of your ARRT card and a copy of the school certificate. Ms. Powell responded that if the student is going through ARRT they just have to provide their ARRT card. Ms. Charman asked for clarification that, once the student had graduated from a program and has their ARRT card, they do not have to mail in a copy of their school certificates. Ms. Powell responded that was correct.

Ms. Charman then asked for clarification on the report from the RTCC JRC meeting that was given on the summary. She said it states that because JCAHO or the equivalent for the clinical education verification, JRC does not verify machine registration but relies on another accrediting body, JCAHO. She wanted to know if that was correct. Chairperson Taylor responded that was correct. Ms. Charman asked if she was saying that JCAHO does not require, when they go into a site visit at a clinical site, that the machines have been registered recently, and that's why RHB wants them to provide RHB with this. Chairperson Taylor responded that she will note the question and will follow-up with a detailed answer later. She asked Ms. Charman to state the question clearly for the minutes. Ms. Charman then replied "I'm asking, are we, as part of the clinical education centers, required to keep a copy of each of our clinical sites, x-ray machine registration, in our records at the school? Or is that part of the – when they do the unannounced site visit, is that something they are going to ask for at the clinical site?"

Committee member Martin asked about implementation of the recently passed senate bill that requires a QA program to be developed. She asked whether RHB was getting any input. She stated that they would welcome the opportunity from the AAPM chapters to work with RHB on suggesting QA programs that could be used as models for the facilities or at least work with RHB staff. She asked if there was any public input coming into RHB staff on these programs. Chairperson Taylor responded that the appropriate person to address that question would be Phillip Scott. Ms. Taylor recommended that Ms. Martin send him an email with her question and recommendations.

Committee Member Garcia stated that at the end of the discussion of JRCERT she wanted to make a motion to form a subcommittee to look into that but was not sure that was the appropriate time. She wanted to know whether there was going to be a subcommittee to look at the JRC and the California regulations and the things that RHB didn't like about JRC, regarding streamlining that or combining that.

Chairperson Taylor asked if she wanted to make a motion.

Committee Member Garcia moved that a subcommittee be formed to further evaluate the JRCERT process, accreditation process, as it relates to title 17, the regulatory process. Committee Member Eng seconded. Committee Member Cohen brought up the discussion about whether to combine that subcommittee with the diagnostic but withdrew when Ms. Slechta shook her head no. The motion passed with one opposed.

JRCERT subcommittee:

Committee member Garcia chairperson.

Dr. Lisa Schmidt, Pima Medical Institute, Chula Vista

Dawn Charman

Ms. McMahan volunteered Cathy Bertsch, Mesa Community College. She stated that Ms. Bertsch asked her to volunteer her.

Dawn Charman suggested that an email or an all schools bulletin be sent asking for asking for volunteers to serve on the committee. Ms. Taylor delegated that request to the Chairperson of the subcommittee.

Ms. McMahan asked why the Department is still looking at a process-driven basis, based on laws that were written in the 1960s, as opposed to going with the competency-based, which is nationally accepted from all other healthcare fields. Chairperson Taylor responded that her question is noted and there are subcommittees that have been formed for all the minimum standards. She assumes that if this is an issue that the subcommittees will be addressing that in their subcommittee work. Now that a JRCERT subcommittee has been formed, some of these questions should be addressed in the subcommittee work.

Ms. Slechta recommended that one of the attorneys be put on the JRCERT subcommittee. She felt that if they work hard on this and say this is good, the nation accepts it. And then the attorney throws it out because they don't have the background to support it because they don't know what's going on, it won't work.

Chairperson Taylor asked if there were any further public comments. None were raised and so she closed the public comment portion of the meeting.

Chairperson Taylor asked if there were any comments from the RTCC committee. Hearing none, she then reminded everyone that the next RTCC committee meeting will be held on September 26, 2007, in Sacramento. She said that correspondence will be sent to all the RTCC committee members. She asked if they had any agenda items, please send them early so that the agenda can be worked on early in the process. Ms. Taylor thanked all those who volunteered for the new subcommittees. She asked that information on the chairpersons and committee members be given to her so that RHB could have a record of it. She thanked everyone for their attendance, their comments, and their participation. She encouraged everyone to continue to give comments and feedback. She asked that they send them via email so that a written record of what is requesting can be done. It is easier to refer back to what is said in writing as opposed to a comment or a conversation. There are no misunderstandings or misquotes when comments and questions are in writing. She again thanked the committee members for their work.

Questions and Answers from this meeting are provided in a separate document entitled “Questions and Answers”.

The “Position Paper on Grandfathering of the Joint Review Committee on Education in Radiologic Technology (JRCERT)” is provided in a separate document.

The meeting was adjourned by Ms. Taylor at 3:51 pm.

Respectfully submitted,

Mary Frances Orduno
Radiologic Health Branch

DRAFT